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February 26, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *The New York Times Co. v. Microsoft Corp., et al.* No. 1:23-cv-11195
New York Daily News, LP, et al. v. Microsoft Corp., et al., No. 1:24-cv-3285
The Center for Investigative Reporting, Inc. v. OpenAI, Inc., No. 1:24-cv-04872

Dear Judge Wang:

I write on behalf of the News Plaintiffs to respond to one aspect of Defendants' February 13, 2025 letter regarding deposition coordination. *See* Dkt. 460.

In their letter, Defendants asked the Court to set a second settlement conference to address outstanding unresolved issues regarding deposition coordination. News Plaintiffs join in this request. Like Defendants, News Plaintiffs believe that the previous session facilitated productive conversations among the parties, and that an additional session will further assist in resolution of unresolved matters. The News Plaintiffs will make themselves available on the dates that Defendants requested (the remainder of the week of February 24, or the week of March 3) or otherwise at the Court's convenience.

Respectfully,

/s/ Zachary Savage
Zachary Savage